



MEMO ENDORSED

MICHAEL A. CARDOZO
Corporation Counsel

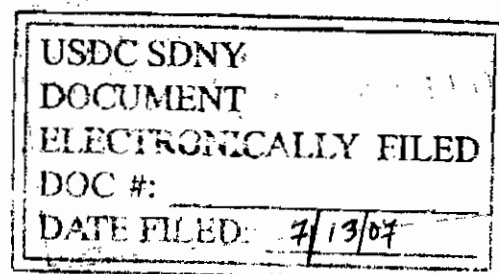
THE CITY OF NEW YORK
LAW DEPARTMENT
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NEW YORK, NY 10007

STEVE STAVRIDIS
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July 2, 2007

By Hand

Honorable Denise L. Cote
United States District Judge
Southern District of New York
500 Pearl Street – Room 1040
New York, New York 10007



Re: Jackson v. City of New York et al., 07 CV ⁵⁶³⁰~~5639~~ (DLC)

Your Honor:

I am an attorney in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, representing defendant City of New York (the "City") in the civil rights referenced action.¹ I am writing to request an extension of the City's time to answer or otherwise respond to the complaint from July 3, 2007 to September 4, 2007. I have conferred with plaintiff's counsel and he has given his consent to the extension.

There are several reasons for seeking the extension. In his complaint, plaintiff alleges, *inter alia*, false arrest and illegal strip search. It is our understanding that the underlying criminal action and police records have been sealed pursuant to New York Criminal Procedure Law § 160.50. As such, we need the additional time to obtain an authorization from the plaintiff, which will allow us to access the sealed records so that we could properly assess the case and answer the complaint. We have forwarded the necessary authorization to plaintiff for execution and are awaiting its return.

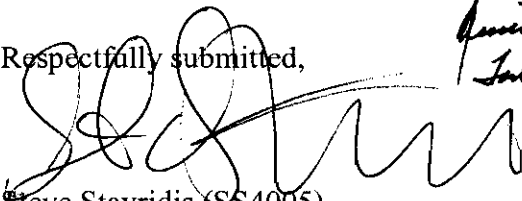
Additionally, upon information and belief, defendant Detective Aishah Williams has not been served with process as of this writing. The enlargement will allow plaintiff additional time to serve this officer and, presuming he is in fact timely served, afford this office time to conduct its statutory inquiry into whether it could represent the officer in this case. See General Municipal Law § 50(k); Mercurio v. The City of New York, et al., 758 F.2d 862, 864-65 (2d Cir. 1985); Williams v. City of New York, et al., 64 N.Y.2d 800, 486 N.Y.S.2d 918 (1985) (decision whether to represent individual defendants is made by the Corporation Counsel as set forth in

¹ Upon information and belief, defendant Williams has not been served with process as of this writing.

state law). Defendant Williams must then decide whether he wishes to be represented by the Corporation Counsel, see Dunton v. County of Suffolk, 729 F.2d 903 (2d Cir. 1984). Only then can this office interview the officer for the purposes of responding to the complaint. It has been our experience that this entire process takes approximately two months to complete.

No previous request for an extension has been made by either party. There are no scheduled conferences that will be affected by this proposed extension. Accordingly, it respectfully requested that the Court grant the City's application to extend its time to answer or otherwise respond to the complaint from July 3, 2007 to September 4, 2007.

Respectfully submitted,


Steve Stavridis (SS4005)
Special Federal Litigation Division

*Granted.
Quinn Lake
July 12, 2007*

cc: Richard J. Cardinale, Esq. (By E-Mail)
Attorney for Plaintiff